## CONDON & FORSYTH LLP

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February 22, 2008

## **BY HAND**

Honorable Alvin K. Hellerstein United States District Court Southern District of New York United States Courthouse 500 Pearl Street, Room 1050 New York, New York 10007 de flat Gulder 1.26 Cet al., 03 Civ. 6800 (AKH)

Re:

In re September 11 Litigation, 21 MC 97

Teague v. American Airlines, Inc., et al., 03 Civ. 6800 (AKH)

C & F Ref: DTB/CRC/28079

Dear Judge Hellerstein:

I write in my capacity as counsel for defendants American Airlines, Inc. and AMR Corporation and also on behalf of counsel for defendant Argenbright Security, Inc.

Enclosed please find, for filing under seal, the unredacted papers in opposition to Plaintiff's motion to enforce a settlement reached in *Teague v. American Airlines, Inc.*, et al., 03 Civ. 6800 (AKH). We also served Plaintiff's counsel with unredacted versions of the opposition papers, but we respectfully request the Court's permission to file the opposition papers under seal.

It is appropriate to file these opposition papers under seal in light of their subject matter and the circumstances of this case. The Settling Defendants' opposition papers describe the negotiation process undertaken to settle the Teague case as well as the settlement amount and the amount of prior advances paid by American to Plaintiff. The Settling Defendants consider the settlement process, strategies employed during the process and the ultimate settlement amount highly confidential and the release of this information would hinder the settlement process in remaining cases.

We respectfully request that you direct that the enclosed documents be accepted for filing under seal by endorsing this letter as set forth below, confirming that the parties' interest in preserving the confidentiality of the terms of their settlement agreement and the manner in which the parties negotiated the settlement outweigh any public interest in knowing that information.

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Respectfully submitted,

Desmond T. Barry, Jr.

THE CLERK OF THE COURT IS DIRECTED TO FILE THE ATTACHED DOCUMENTS UNDER SEAL.

SO ORDERED:

Hon. Alvin K. Hellerstein, U.S.D.J.

**Enclosures** 

cc: <u>Via Email</u>

Mary F. Schiavo, Esq. (w/ encl.) Counsel for Plaintiff Elaine Teague

Brian J. Alexander, Esq. (w/o encl.) Kreindler & Kreindler

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Aviation Defendants' Counsel (w/o encl.)